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ELI LILLY INDUSTRIES, INC.

M. 12, 12TH INFANTRY AVE.
SAN JUAN, PUERTO RICO
G.P.O. BOX 71325
SAN JUAN, PUERTO RICO 00936

RM. 146.7 STATE HOUSE 2
MAYAGUEZ, PUERTO RICO
P.O. BOX 1741
MAYAGUEZ, PUERTO RICO 00681

✓ May 7, 1987

CERTIFIED/RRR (P389027590)

Mr. Javier Pedrosa
Hazardous Waste Section
Environmental Quality Board
Box 11488
Santurce, Puerto Rico 00910

Dear Mr. Pedrosa:

Please find enclosed the information requested in our meeting on April 3, 1987.

1. The topographic map supplied is a magnified copy of the previous topographic map provided with the application. The scale used is 1 inch = 450 feet. The 200 ft. scale was impossible to make, since the resolution of the details and elevations are not shown.
2. The corrections of Part B is provided using loose pages identified by the page number used in Part B. Please substitute the reference page by the updated pages.
3. The coating that was applied to the hazardous waste storage area is Ceilcote Flakeline 252 Gray Batch No. B6J05L021. (Polyester Based Paint) Flash point 34 centigrades degrees. The rest of the specification will be supplied further on, since we do not have the specification sheet on hand at this time.
4. An information sheet is included for the adsorbent material used to collect solvent spills. This is all the information available at this time. Please let us know if further information is needed to contact the manufacturer.
5. The roof for the hazardous waste drum storage area is contemplated to be finished by the end of July, 1987.
6. The original information about the certification as well as the Trust Agreement will be sent to you as soon as we return from New York trip (May 15).

CORRECTIONS TO PART B

solvents are in the same family of solvents as those stored and treated at Mayaguez.

Procedures and methods for sampling and analysis are described in Appendix V.

C-1(a) Containers

Small volumes of hazardous wastes are stored at Mayaguez in containers prior to onsite treatment or offsite disposal. These types of wastes can be categorized into groups consisting of: solvent laden solids for off-site disposal, waste solvents for on-site treatment or off-spec 40 CFR 261.33 (e) or (f) wastes.

Solvent laden solid wastes or solid wastes containing EP toxic heavy metals are destined for disposal off-site at approved secure chemical management facilities. These wastes are collected in containers and identified with the EPA hazardous waste numbers D001, D004, D005, D006, D007, D008, D009, D010, D011, F001, F002, F003 and F005. Table C-1 includes the actual or potential hazardous constituents in containerized solid wastes stored at Mayaguez. The relative concentrations are similar to those for the liquid hazardous waste shown in Table C-3. The constituents and relative concentrations are known from the manufacturing process tickets (protocols).

Liquid waste solvents from Eli Lilly Industries, Inc. at Carolina,

TABLE C-1
ELI LILLY INDUSTRIES, INC.
CONTAINER STORAGE AREA HAZARDOUS WASTE CONSTITUENTS

<u>Hazardous Constituents</u>	<u>EPA Hazardous Waste Number</u>	<u>Basis for Hazardous Waste Designation</u>
Spent halogenated solvents used in degreasing (tetrachlorethylene, trichlorethylene, methylene chloride, 1,1,1-trichlorethane, carbon tetrachloride, and chlorinated fluorocarbons) and sludges from the recovery of these solvents in degreasing operations.	F001	Waste contains listed toxic solvents.
Spent halogenated solvents and still bottoms from the recovery of these solvents (tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2,2-tetrachloro-1,2,2-trifluoro ethane orthodichloro-benzene, trichloro-fluoromethane).	F002	Waste contains listed toxic solvents.
Spent non-halogenated solvents and still bottoms from the recovery of solvents (xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, methanol)	F003	Waste contains listed these ignitable solvents.
Spent non-halogenated solvents and still bottoms from the recovery of these solvents (toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine).	F005	Waste contains listed and ignitable solvents.
Ignitable waste	D001	Flash point for waste is less than 60C (140F)
EP Toxic	D004 @ D011	Wastes are EP toxic-261.24
Off-specification Commercial chemicals	P023 @ P122 U00 @ U247	Listed in 261.33 (e) & (f)
Corrosive waste	D002	See Section A Corrosive